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6 Financial, Inc. and Mortgage Electronic
Registration Systems, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

11 CATARINO MENDOZA,) Case No. 3:10-cv-05792-SC
12 Plaintiff,)
13 v.)
14 WILMINGTON FINANCE, a business entity,)
form unknown; FIVE STAR INVESTMENT)
AND REALTY; ACADEMY ESCROW, INC.,)
a business entity, form unknown; NEW)
CENTURY, business entity, form unknown;)
NORTH AMERICAN TITLE COMPANY, a)
business entity, form unknown; MORTGAGE)
ELECTRONIC REGISTRATION SYSTEMS,)
INC., a business entity, form unknown;)
VERICREST FINANCIAL, a business entity,)
form unknown, and DOES 1-100, inclusive,)
Defendants.)
STIPULATION TO FURTHER EXTEND
DEADLINE OF DEFENDANTS
VERICREST FINANCIAL, INC. AND
MORTGAGE ELECTRONIC
REGISTRATION SYSTEMS TO
RESPOND TO PLAINTIFF'S FIRST
AMENDED COMPLAINT
[Local Rule 6-1]

1 WHEREAS:

2 1. Plaintiff Catarino Mendoza (“Plaintiff”), on the one hand, and defendants
 3 Vericrest Financial, Inc. (“Vericrest”) and Mortgage Electronic Registration Systems, Inc.
 4 (“MERS”), on the other hand, are exploring the possibility of resolution by means of a loan
 5 modification;

6 2. Pursuant to a previous stipulation approved by the Court, June 1, 2011 is the
 7 current deadline for defendants Vericrest and MERS to file and serve their respective responses
 8 to the first amended complaint (“FAC”);

9 3. To facilitate the discussions concerning a potential loan modification, the parties
 10 to this matter previously submitted a stipulation and proposed order to continue the case
 11 management conference (“CMC”) (previously set for June 10, 2011) to August 12, 2011;

12 4. Plaintiff, on the one hand, and Vericrest and MERS, on the other hand, agree that
 13 their discussions about potential resolution of this matter would be facilitated by a further
 14 extension of the deadline for Vericrest and MERS to respond to the first amended complaint.

15 **THEREFORE:**

16 In view of the foregoing, and pursuant to Local Rule 6-1, plaintiff Catarino Mendoza and
 17 defendants Vericrest and MERS hereby stipulate that the deadline for Vericrest and MERS to file
 18 and serve their respective responses to plaintiff’s first amended complaint is extended, up to and
 19 including July 1, 2011.

20 Dated: June 1, 2011

RUSS M. FUKANO
 KENNETH J. MACARTHUR
 TROYGOULD PC
 /s/ Kenneth J. MacArthur

By: Kenneth J. MacArthur
 Attorneys for Defendants Vericrest Financial,
 Inc. and Mortgage Electronic Registration
 Systems, Inc.

25 Dated: May 31, 2011

LEPERA & ASSOCIATES, PC.

By: /s/ Joseph A. Lepera
 Joseph A. Lepera
 Attorneys for Plaintiff Catarino Mendoza



1 **ATTESTATION PURSUANT TO GENERAL ORDER NO. 45**

2 Pursuant to General Order No. 45 of the Northern District of California, I attest that
3 concurrence in the filing of the document has been obtained from each of the other signatories to
4 this document.

5 By: /s/ Kenneth J. MacArthur

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